



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

March 4, 2013

Mr. Oscar A. Limpias, Vice President-Nuclear
and Chief Nuclear Officer
Nebraska Public Power District
Cooper Nuclear Station
72676 648A Avenue
Brownville, NE 68321

SUBJECT: ANNUAL ASSESSMENT LETTER FOR COOPER NUCLEAR STATION
(REPORT 05000298/2012801)

Dear Mr. Limpias:

On February 13, 2013, the NRC completed its end-of-cycle performance review of Cooper Nuclear Station. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from January 1, 2012 through December 31, 2012. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. This performance review and enclosed inspection plan do not include security information.

The NRC determined the performance at Cooper Nuclear Station during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

In our assessment letter dated March 5, 2012, (ML120650243), the NRC opened a substantive cross-cutting issue in the problem identification and resolution area associated with the thoroughness of problem evaluation such that the resolutions address causes and extent of condition [P.1(c)]. This substantive cross-cutting issue remained open at mid-cycle 2012 as stated in our assessment letter dated September 4, 2012 (ML12243A437), because your performance had not shown sustainable improvement in this area. In addition, since your performance has not yet shown sustainable improvement in this area during the current assessment period, as evidenced by the identification of eight findings with the P.1(c) cross-cutting aspect, the substantive cross-cutting issue in P.1(c) will remain open. This substantive cross-cutting issue will remain open until your staff demonstrates sustainable performance improvements as evidenced by effective implementation of an appropriate corrective action plan that results in no safety significant inspection finding and a notable reduction in the overall number of inspection findings with the same common theme.

In our mid-cycle assessment letter dated September 4, 2012 (ML12243A437), the NRC identified a cross-cutting theme in the decision-making component of the human performance area [H.1(b)]. You have implemented various corrective actions to address this theme.

However, those efforts have not yet demonstrated sustainable performance improvements by a notable reduction in the overall number of inspection findings with the same common theme. In addition, during the current assessment period, the NRC identified thirteen findings with a cross-cutting aspect in H.1(b). On this basis, the substantive cross-cutting issue in H.1(b) will remain open until your staff demonstrates sustainable performance improvements.

During this assessment period, the NRC also identified a cross-cutting theme in the resources component of the human performance area [H.2(c)]. Specifically, the NRC identified four findings associated with procedures that were not complete, accurate, and up-to-date. Although you recognized the cross-cutting theme in H.2(c), your corrective actions were not effective in addressing this issue. Therefore, because a cross-cutting theme exists and the NRC has concerns with the scope of your efforts in addressing that theme, the NRC determined that a substantive cross-cutting issue exists in H.2(c). This substantive cross-cutting issue will remain open until your staff demonstrates sustainable performance improvements as evidenced by effective implementation of an appropriate corrective action plan that results in no safety significant inspection finding and a notable reduction in the overall number of inspection findings with the same common theme.

The NRC plans to perform inspections of your actions to address the three substantive cross-cutting issues after you notify us in writing of your readiness for these inspections.

We request that you schedule a public meeting by June 30, 2013, to discuss your progress and the status of your plans for addressing the substantive cross-cutting issues described above. Additionally, we request you provide a written response within 30 days of the date of this letter that provides details of your planned corrective actions and a schedule outlining when you expect to be ready for inspection of the corrective actions for each of the open substantive cross-cutting issues. With respect to the substantive cross-cutting issue associated with the thoroughness of evaluation to resolve issues, P.1(c), this is the third consecutive letter documenting this issue. As a result, we request that you arrange to perform an independent assessment of the safety culture at Cooper Nuclear Station. Upon completion of the independent safety culture assessment, the NRC plans to review the assessment results to confirm that your staff is appropriately addressing any issues identified by the safety culture assessment.

The enclosed inspection plan lists the inspections scheduled through June 30, 2014. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security related inspections, which will be sent via separate, non-publicly available correspondence.

In accordance with 10 CFR 2.390 of the NRC's Rules of Practice, a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

O. Limpias

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Please contact me at 817-200-1144 with any questions you may have regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David Proulx", written in a cursive style.

David Proulx, Acting Chief
Project Branch C
Division of Reactor Projects

Docket No. 50-298
License No. DPR-46

Enclosure:
Cooper Nuclear Station Inspection/Activity Plan

02/26/2013 13:03:43

Report 22

Cooper

Inspection / Activity Plan

03/01/2013 - 06/30/2014

Unit Number	Planned Dates Start End	Inspection Activity	Title	No. of Staff on Site
1	03/01/2012 06/30/2013	2515/182 - DEGRADATION UNDERGROUND PIPING (PHASE 1)		3
		IP 2515/182	Review of the Implementation of the Industry Initiative to Control Degradation of Underground Piping	
1	02/25/2013 03/08/2013	EB1-17T - 50.59 & PERM PLANT MOD		3
		IP 7111117T	Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications	
1	02/25/2013 03/08/2013	IP 7111117T-chng/tst	change/test/evaluations	
1	02/25/2013 03/08/2013	IP 7111117T-evals	evaluations	
1	02/25/2013 03/08/2013	IP 7111117T-permmod	permanent mods	
		PI&R 52B - BIENNIAL PI&R		4
1	03/11/2013 03/15/2013	IP 71152B	Problem Identification and Resolution	
1	03/25/2013 03/29/2013	IP 71152B	Problem Identification and Resolution	
		PSB2-RP - RADIATION SAFETY		4
1	04/29/2013 05/03/2013	IP 71124.05	Radiation Monitoring Instrumentation	
1	04/29/2013 05/03/2013	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
1	04/29/2013 05/03/2013	IP 71124.07	Radiological Environmental Monitoring Program	
1	04/29/2013 05/03/2013	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
		EP-2 - EP PERFORMANCE INDICATORS		1
1	06/24/2013 06/28/2013	IP 71151-EP01	Drill/Exercise Performance	
1	06/24/2013 06/28/2013	IP 71151-EP02	ERO Drill Participation	
1	06/24/2013 06/28/2013	IP 71151-EP03	Alert & Notification System	
		EP1 - BIENNIAL PROGRAM INSPECTION		1
1	06/24/2013 06/28/2013	IP 7111402	Alert and Notification System Testing	
1	06/24/2013 06/28/2013	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
1	06/24/2013 06/28/2013	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
		EB2-05T - TRIENNIAL FIRE PROTECTION INSPECTION		4
1	08/12/2013 08/16/2013	IP 7111105T	Fire Protection [Triennial]	
1	08/26/2013 08/30/2013	IP 7111105T	Fire Protection [Triennial]	
		PSB2-RP - RADIATION PROTECTION		2
1	08/05/2013 08/09/2013	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	08/05/2013 08/09/2013	IP 71124.02	Occupational ALARA Planning and Controls	
1	08/05/2013 08/09/2013	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1	08/05/2013 08/09/2013	IP 71151-PR01	RETS/ODCM Radiological Effluent	
		EB2-03 - POST-APPROVAL LICENSE RENEWAL		4
1	10/07/2013 10/11/2013	IP 71003	Post-Approval Site Inspection for License Renewal	
1	10/21/2013 10/25/2013	IP 71003	Post-Approval Site Inspection for License Renewal	

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			RS24	- RADIATION SAFETY	2
1	06/16/2014	06/20/2014	IP 71124.02	Occupational ALARA Planning and Controls	
1	06/16/2014	06/20/2014	IP 71124.04	Occupational Dose Assessment	